

# Exhibit I

1 information that's on the screen and overlays on top of that a  
2 set of custom keystrokes that are designed to let you move  
3 around the screen and find out what information is on the  
4 screen.

5 A really basic example might be when you're using -- when  
6 you're working in, say, Microsoft Word and you're writing a  
7 document and you want to know what page you're on -- you know,  
8 if I've written -- I do this all the time. My reports go to  
9 three to four pages, and I always go, "Well, I've been writing  
10 for a long time. How far have I written?" I can glance down  
11 on the corner of the screen and say, "I'm on page 4."

12 Blind people can't do that, and there's no command or  
13 functionality in Word that says, "Hey, let me move to where the  
14 page number is."

15 So JAWS has a technique, has some commands and stuff built  
16 into it that would allow me to say to JAWS, "Hey, I want to go  
17 find out what the page number is." I still need to know where  
18 it is, but I can go find out where that is, and it probably  
19 takes me a handful of keystrokes to say, "Hey, JAWS, I want to  
20 go into this review mode. I want to go to the bottom of the  
21 page. I want to move to the beginning of the line. I want to  
22 read through that line a few words at a time until I hear it  
23 say 'page' and tell me what number I'm on."

24 **Q.** So for a sighted person watching a blind person use JAWS,  
25 is it always obvious where the JAWS cursor will be and where

1 the blind person's focus and cursor is located?

2 **A.** No.

3 **Q.** And is the JAWS cursor always connected to the mouse or  
4 the typing cursor?

5 **A.** No. So some of these commands that I say when I say I  
6 want to move down and move and read the page number, I have to  
7 disconnect from the focus where I'm typing on the screen, and  
8 now I'm using the mouse. Visually, it looks like I'm moving  
9 the mouse around, but I'm hearing what's underneath that. And,  
10 by the way, there's ways to do that without moving the mouse.

11 And then when I'm all done, I have to reconnect myself  
12 back up to the place where I was before where the real cursor  
13 is for me to start working again.

14 **Q.** So if a blind person were sitting at a computer, let's  
15 just say, driving JAWS with keyboard commands and a sighted  
16 person were standing next to them watching the screen, how easy  
17 would it be for the blind person to understand where the  
18 sighted person might be pointing to -- or let's say the sighted  
19 person also is controlling the mouse. How easy would it be for  
20 the blind person and the sighted person to each understand  
21 where their respective cursors were engaging and sort of  
22 working together?

23 **A.** I don't think it's necessarily obvious at all that  
24 they're -- where or what the blind person is hearing unless the  
25 sighted person is paying close attention. And I know that the

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1 number one complaint I hear about sighted people is how  
2 difficult it is to understand the screen readers.

3 So I think one of my complaints that I have in my -- when  
4 I'm working with people is often from family members of the  
5 person I'm working with that say they don't understand where or  
6 what or how their relative is using the computer to help them,  
7 especially on web pages, where the way that JAWS gives you  
8 information about web pages is even more opaque to a sighted  
9 user.

10 **Q.** And did you go to inspect the Clerk-Recorder's facility  
11 and computer kiosk in around August of 2023?

12 **A.** Yes.

13 **Q.** And did you have an opportunity to sit down and look at  
14 the computer kiosk with the Web wizard or the software suite on  
15 it?

16 **A.** Yes.

17 **Q.** And did you have a chance to look at the keyboard that was  
18 there at the computer?

19 **A.** Yes.

20 **Q.** For a blind user, could you describe what is the  
21 significance of a keyboard layout?

22 **A.** So many applications -- there's so many applications that  
23 do so many things that all the common combinations of  
24 keystrokes are used up. So, for example, if I want to do  
25 something in Word to save a document, I might do control S or I

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1 might do alt FS. There's a bunch of ways I can do stuff, but I  
2 have key commands that can do that.

3 But because JAWS requires more keystrokes to be able to  
4 move around and use an application, sometimes there aren't very  
5 many combinations that are left, or they're weird combinations  
6 that don't make any sense. So JAWS and all the screen readers  
7 have come up with a custom keystroke -- usually it's the insert  
8 key on the number pad -- to say "Use this key. Hold this key  
9 down and press a letter on the keyboard and I will do something  
10 for you. I will tell you something," so that it gives you a  
11 whole new layer of commands.

12 No application -- no standard applications that I know of  
13 have ever used the insert key for doing that kind of thing.

14 The problem with the insert key is that it is one of those  
15 keystrokes that moves around on a keyboard, especially -- there  
16 are standard desktop keyboard layouts; but from -- if you're  
17 using -- if you're a laptop user, the insert key can move  
18 around to a dozen different places on the keyboard, and  
19 sometimes the insert key is not even obviously available on  
20 that -- on a keyboard.

21 **Q.** And so how easy would it be for a blind person to walk up  
22 to a keyboard that was different from their, you know, keyboard  
23 that they're used to using and to just sit down and start using  
24 a computer with JAWS?

25 **A.** It would be very difficult.

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1 would have been able to do that independently.

2 Q. And aside from anything you observed me doing, did you  
3 feel you had an adequate opportunity to inspect the form  
4 independently on your own without, you know, any input from me?

5 A. Yes.

6 Q. And at some point did you have an opportunity to review  
7 the way that this FBNS wizard software suite works on your home  
8 computer?

9 A. Yes.

10 Q. And did you feel that you had an adequate opportunity to  
11 assess and review the FBNS wizard form as it was rendering on  
12 your home computer web browser?

13 A. Yes.

14 Q. And how did the two versions of the FBNS wizard compare  
15 between the computer in the Clerk-Recorder's Office and what  
16 you observed at your home computer?

17 A. They behaved identically.

18 Q. Okay. And what kind of computer -- you've called it a  
19 kiosk, but what kind of a computer did the County have there in  
20 the public viewing room?

21 A. I think it was a Dell lap- -- a Dell desktop. It might  
22 have been an HP. It was a desktop computer.

23 Q. Did it appear to be, like, a standard Windows computer?

24 A. Yes.

25 Q. Okay. And, Mr. Clark, I'm going to ask you about -- did

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1 you eventually compose some opinions in this case about the  
2 usability of the FBNS wizard form with JAWS?

3 **A.** Yes.

4 **Q.** And what was your opinion about the usability of the -- at  
5 that time in August of 2023, what was your opinion about the  
6 usability of the FBNS wizard form with the JAWS screen reader?

7 **A.** Is there a copy of my report here that I could refer to?

8 **Q.** Would that help refresh your recollection?

9 **A.** Yes.

10 **MR. ELDER:** Your Honor, may I pass the witness a copy  
11 of his expert report?

12 **THE COURT:** Yes.

13 **MR. ELDER:** Okay. Michelle?

14 **MS. KOROSY:** Yeah.

15 **THE WITNESS:** So what was your question again?

16 **BY MR. ELDER:**

17 **Q.** So did you come to an opinion about the usability of the  
18 FBNS wizard form as how it worked with the JAWS screen reader?

19 **A.** I did.

20 **Q.** And what was that opinion?

21 **A.** I believe that the form could not be filled out  
22 independently by what I would consider an average JAWS user;  
23 that the form met -- just did not provide enough information in  
24 certain places on the screen to be able to complete the form  
25 and be sure that the information was correct before submitting

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1 it.

2 **Q.** And in your evaluation of filling out the form and sort of  
3 assessing it, did you have enough time to estimate the amount  
4 of time that it might take to fill out the FBNS wizard form if  
5 someone were sort of running a tandem session with JAWS and the  
6 mouse?

7 So a sighted person using the mouse and a blind person  
8 sort of controlling with the JAWS screen reader and the  
9 back-and-forth, did you -- were you able to spend enough time  
10 with this program to estimate about how much time it might take  
11 if a blind and a sighted person were trying to fill out this  
12 form in a combination of techniques between clicking the mouse  
13 and using JAWS?

14 **A.** Yes.

15 **Q.** And --

16 **A.** Go ahead.

17 **Q.** Oh. And if you could estimate, about how much time do you  
18 think it, you know, might take using that sort of tandem  
19 process?

20 **A.** I think 10 to 15 minutes.

21 **Q.** Okay. And then after -- let's go back to the -- to the  
22 Clerk-Recorder's Office.

23 After the form -- sorry. Was the form eventually  
24 submitted through the FBNS form in the Clerk-Recorder's Office?

25 **A.** Yes.



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1 **Q.** Okay. And were you working on the assumption that it  
2 would take about five minutes for, at least in her case, to  
3 complete an FBS form with a human transcriber at the check-in  
4 counter?

5 **A.** Yes.

6 **Q.** And then did you come to an opinion about how the process  
7 for a blind applicant to use the electronic FBNS form on the  
8 computer in the Clerk-Recorder's Office compared with the  
9 experience described by Ms. Greco?

10 **A.** Yes.

11 **Q.** And what was your opinion in that regard?

12 **A.** That the multiple steps in the process to provide access  
13 to that computer added several many minutes to the process of  
14 filling out the form and getting it submitted.

15 **MR. ELDER:** One second.

16 (Pause in proceedings.)

17 **BY MR. ELDER:**

18 **Q.** Mr. Clark, in coming to your opinions, do you feel you had  
19 sufficient information in which you were given to support your  
20 conclusions?

21 **A.** Yes.

22 **MR. ELDER:** Okay. We can turn the witness over,  
23 Your Honor.

24 **THE COURT:** All right. Does the defense have any  
25 questions for the witness?